

DECLARATION OF DANIEL W BYANSKI

DANIEL W. BYANSKI, hereby declares under the penalty of law that the following is true and correct:

1. I am over 18 years of age and reside in Allen County, Indiana. I am making this declaration under my own free will. I am a Defendant in Civil Action No. 1:20-cv-3159-JPH-TAB in the Southern District of Indiana. Plaintiffs LHF Productions, Inc and Fallen Productions, Inc. have alleged that I infringed the copyrights in their motion pictures. I deny these allegations.

2. I understand that Plaintiffs assert that they have evidence that I logged into my email address dbyanski@gmail.com from IP address 89.187.181.204 between April and May of 2020, and around that same time period copies of the motion pictures London Has Fallen; Hellboy; Rambo V: Last Blood; Hunter Killer; Olympus Has Fallen; and Angel Has Fallen were shared from that IP address.

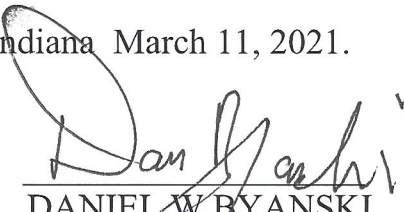
3. I deny being responsible for this activity. Around that same time period, someone illegally accessed ("hacked") into my email accounts and Paypal account. The individual stole about \$12,000 from my Paypal account. Paypal refunded this amount back to me.

4. I understand that IP address 89.187.181.204 is associated with a Virtual Private Network ("VPN") provider and the data center Datacamp Limited. I do not have VPN service.

5. I also understand that the agent for copyright holders has sent hundreds of notices of infringement to Datacamp Limited. I wish Datacamp Limited had taken action against the subscriber at this IP address in response to those notices so that possibly the damages I have suffered from this hacking, including being accused of copyright infringement could have been prevented.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Fort Wayne, Indiana March 11, 2021.



DANIEL W BYANSKI
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